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January 15, 2010

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RE: Comments on Proposed Amendments to the Statewide Portable Equipment Registration Program (PERP) and the Airborne Toxic Control Measure for Diesel Fueled Portable Engines (Portable Engine ATCM).

Dear Board Members,

Thank you for the opportunity to provide comments for you to consider regarding the above regulation. We, at the CAT Rental Store, would like to encourage CARB and Staff to thoroughly review and strenuously consider ALL the comments and suggestions submitted to this site. After reviewing some of the comments already submitted to the Board, we find that like so many others, we too support the CARB efforts to present a viable regulation that is fair and affordably timely.

Points of Concern:

As a larger company that owns and rents more than 25 engines, we continuously strive to be compliant and up-to-date with CARB requirements. Our support, for the rule change, weakens with the following concerns:

- 1) Recordkeeping and annual reporting - This procedure needs to be assessed and reviewed with our recommendation of completely terminating this step. The excessive time spent tracking and reporting each engine on rent does not return a single dollar justifying the final, small sheet of paper with information and does not contribute anything to our final goal of reduced emission. Additionally, trying to track a towable rental every single day is near impossible.
- 2) Targeted relief – As it currently stands, this CARB action would be grossly unfair. Adjustment to the current economy is affecting all business sizes. Even with major reductions in fleet size, we are proving to ourselves that it all comes down to the return on our investment, which is *mighty* slim these days. Our utilization of equipment has never been lower! Either we are all compliant and current or we all receive the same time extension.
- 3) Inspection of engines – Current regulation requires notification to local air districts when new equipment registration is received so an inspection can be arranged. Inspections are also performed randomly on equipment known to be registered. Our recommendation for inspections would be to focus on those older registrations and engines that no longer meet PERP regulation and confirm their sale, disposal or replacement. When it comes to emissions controls, these older units should be the first focus. Newer, more recent registrations are on newer, “younger” engines. Scheduling an inspection at such an early stage is poor utilization of your personnel.

- 4) Costs of compliance – We appeal to CARB to consider the impact of this regulation on the overall health of our State's business economy. While we support the rule change, more focus should be centered on the extreme demand made on business well-being at a very unhealthy time in our economy. These costs have increased at an extremely rapid rate while income and utilization has dropped dramatically. The cost of being CARB compliant is fast becoming unsustainable.

Thank you for the opportunity to contribute our comments and suggestions regarding the rule amendments.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Johnson', written in a cursive style.

John Johnson
Holt of California
Vice President,
The CAT Rental Store